

BAAQMD Response to EBMUD Comments

1. Comment: Abatement devices A463 and A464, which control S110, Preliminary Treatment, were not included in the proposed Title V renewal. Also, the wording of Condition 17335 for S110, A463, and A464, does not match the wording in the District Permit to Operate issued pursuant to Application 28331
Response: These abatement devices were permitted in 2018 in Application 28331 and the permit condition was amended. Unfortunately, they were not included in the proposal for the renewal. These changes will be incorporated into the Title V permit using minor revision procedures after the renewal is issued.
2. Comment: The numbering of Condition 20651 is in error.
Response: Corrections have been made to the numbering of the condition.
3. Comment: Permit Condition 24050, part 5, implies that the SO₂ concentration from S54, Turbine, must be measured every day. The NSPS allows for compliance by measuring the sulfur content of the fuel. Also, cited section 60.4333(a)(3) does not exist.
Response: The condition has been amended to explicitly require measurement of the sulfur in the fuel to determine compliance with the 0.15 lb SO₂/MMBtu limit. Section 60.4333(a)(3) has been corrected to section 60.4330(a)(3).

Following is the text of the condition as proposed on July 15, 2019:

"Sulfur Dioxide (SO₂) emissions from the gas turbine shall not exceed 0.15 lb/MMBtu. The owner or operator may demonstrate compliance with this part by analyzing the exhaust gas of the turbine or by calculating the SO₂ concentration by mass balance based on the digester gas TRS concentration. The owner or operator shall determine and record the turbine SO₂ exhaust concentration at least one time every day in accordance with Section 60.4360 and 60.4370 or any alternative monitoring approved by US EPA. (Basis: 40 CFR Part 60 Subpart KKKK, Sections 60.4333(a)(3) 60.4360, and 60.4370)"

Following is the text of the corrected condition:

"Sulfur Dioxide (SO₂) emissions from the gas turbine shall not exceed 0.15 lb/MMBtu. The owner or operator ~~may shall~~ demonstrate compliance with this part on a daily basis in accordance with the requirements of 40 CFR 60.4360 and 60.4370 ~~by analyzing the exhaust gas of the turbine or by calculating the SO₂ concentration by mass balance based on the digester gas TRS concentration. The owner or operator shall determine and record the turbine SO₂ exhaust concentration at least one time every day in accordance with Section 60.4360 and 60.4370~~ or any alternative monitoring approved by US EPA. (Basis: 40 CFR Part 60 Subpart KKKK, Sections 60.4330~~3~~(a)(3) 60.4360, and 60.4370)"